

EXHIBIT 6

Subject: RE: CG3 v. Belleau: Discovery Dispute

Date: Tuesday, November 16, 2021 at 4:24:50 PM Eastern Standard Time

From: dkeyhani@keyhanillc.com

To: Bryon Wasserman

CC: fstephenson@keyhanillc.com, aengel@keyhanillc.com, Eta Lahav, Paralegals

Bryon, I am confused about your email and letter. Plaintiffs have already made a production of the responsive documents that were located. At this time Plaintiffs have not indicated that they are withholding any responsive documents and have given you a specific date (Nov. 24th) by which they will produce any additional responsive documents located and/or identify documents they are withholding, if any. Your claims in your draft letter are a misrepresentation of the facts, an attempt to harass Plaintiffs, and a waste of the Court's and Plaintiffs' time and resources where you are manufacturing a discovery dispute where none exists. During our meet and confer on Friday we agreed that we would confer with our client regarding the discovery issues you raised and get back to you this week with confirmation of what additional documents are located, if any, and indicate if there are any documents Plaintiffs are going to withhold for any reason. We also advised that to the extent additional documents are located we would produce by next week and that we would further consider the issues you raised with respect to interrogatories 1,5,10, and 12 and supplement Plaintiffs' responses if necessary.

Further, despite your characterizations, Plaintiffs have already produced the relevant source code (we mailed the code to you to avoid the extra cost and time of an in-person review which was provided for under the protective order). However, we advised that we are working with our client to get you the additional source code information requested, to the extent it exists, despite believing that your demand is beyond reasonable scope of discovery.

Given the large and expansive scope of your document requests (59) and broad request for source code and related information, given that

our client is one person with a full-time day job, and given that Plaintiffs have fully complied with their obligations under the Federal Rules and already made a good-faith effort to respond to Defendant's broad discovery requests, the time frame that it has taken him to locate and gather the documents/source code is very reasonable.

On a separate note, we have reviewed Defendant's responses to Plaintiffs' First Set of Requests for Production of Documents and Things they are deficient because: 1) in your responses you do not indicate whether you withheld any responsive documents; 2) you do not identify which specific documents will be withheld with respect to each request; and 3) you do not provide a date for when you will produce all the responsive documents. You have requested all this information from Plaintiffs and argued that the parties are entitled to this information, so there is no justification for your omission of this information.

Accordingly, please advise your availability for a meet and confer this week. We can be available tomorrow at 1 pm or Thursday at 11 am, 1 pm, 3 pm, or 4 pm. Please advise which time works for you.

Darius

-----Original Message-----

From: "Bryon Wasserman" <bryon@radip.com>
Sent: Monday, November 15, 2021 8:26pm
To: "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>
Cc: "fstephenson@keyhanillc.com"
<fstephenson@keyhanillc.com>, "aengel@keyhanillc.com"
<aengel@keyhanillc.com>, "Etain Lahav" <etai@radip.com>,
"Paralegals" <paras@radip.com>
Subject: CG3 v. Belleau: Discovery Dispute

Darius

I am following up from Friday's meet and confer. Upon further consultation with the team, given that CG3 cannot at this time make any commitments for production, we believe that this issue is ready to be brought to the Court's attention. We have attached a draft discovery letter with Belleau's section. Please provide CG3's portion by no later than Wednesday at noon.

Regards
Bryon

Bryon Wasserman
Radulescu LLP | [Of Counsel](#)
646-502-5935 Direct
202-281-0664 Cell
646-502-5950 Main